Angus James Bell, Esq.

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Email: ajamesbelllaw@Application granted.

Via ECF

Hon. Paul E. Davison United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601 SO ORDERED.

Philip M. Halpern

United States District Judge

Dated: White Plains, New York

March 24, 2023

Re: United States v. Jeremy Williams, 22Cr641

Dear Judge Davison:

I am CJA appointed counsel for Mr. Jeremy Williams who is charged with participating in a Racketeering Conspiracy and other related offenses.

I write to request approval for the appointment of Gilbert Parris, Esq. as associate counsel for the purpose of reviewing and summarizing discovery materials, as well as visiting and conferring with the client at the rate of \$90 per hour. As discussed at our recent status conference, the Government anticipates producing an extensive amount of discovery that counsel needs to review with Mr. Willaims and then determine if we plan to file substantive motions. Mr. Parris is an experienced attorney with extensive expertise in reviewing voluminous discovery in both electronic and document form, preparing legal memoranda and trial preparation. Given Mr. William's exposure in this matter and the need to review the extensive amount of discovery, Mr. Parris would be a valuable addition to the defense team and will result in significant cost savings to the Court.

I further submit that such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case. Counsel specifically requests approval for an initial 100 hours at \$90 hours without prejudice to seeking authority for additional time should the review goes beyond the 100 hours.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

	Respectfully submitted,
Cc: All counsel, by ECF	A James Bell, Esq.